

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

HAYMOUNT URGENT CARE PC and  
ROBERT A. CLINTON, JR., *individually and  
on behalf of all those similarly situated,*

Plaintiffs,

v.

GOFUND ADVANCE, LLC, FUNDING 123,  
LLC, MERCHANT CAPITAL LLC, ALPHA  
RECOVERY PARTNERS, LLC, YITZCHOK  
("ISAAC") WOLF, JOSEF BREZEL, JOSEPH  
KROEN, AND YISROEL C. GETTER,

Defendants.

Case No. 1:22-cv-01245-JSR

**DECLARATION OF SHANE R. HESKIN IN SUPPORT  
OF PLAINTIFFS' MOTION TO AMEND THE AMENDED COMPLAINT**

SHANE R. HESKIN, pursuant to 28 U.S.C. § 1746, declares under penalties of perjury  
that the foregoing is true and correct:

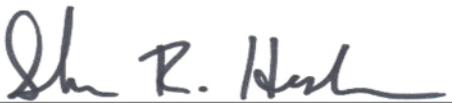
1. I am a Partner of White and Williams LLP, attorneys for Plaintiffs Haymount  
Urgent Care PC ("Haymount") and Robert A. Clinton, Jr. ("Dr. Clinton"). I make this Declaration  
in support of Plaintiffs' Motion to Amend the Amended Complaint [DE 209]. Unless otherwise  
noted, I am personally familiar with the facts set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiffs' Proposed  
Second Amended Complaint. Exhibits referenced therein are the same as those filed with the  
Amended Complaint and are located at [DE 28-1 to 28-11].

3. Attached hereto as **Exhibit B** is a true and correct copy of a redline comparison of  
Plaintiffs' Proposed Second Amended Complaint and Plaintiffs' Amended Complaint [DE 28].

Dated: March 22, 2023

**WHITE AND WILLIAMS LLP**

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